

FILED

FEB - 1 2016

CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

S. E. RILEY 060512
(Name of Plaintiff)
P.O. BOX 5002
(Address of Plaintiff)
CALIPATRIA, CA. 92233

2:16 - CV - 197 — EFB PC
(Case Number)

vs.

COMPLAINT

S. KERNAN ET AL
W. L. MONTGOMERY
B. HEDRICK
(Names of Defendants)

I. Previous Lawsuits:

A. Have you brought any other lawsuits while a prisoner: ☒ Yes ☐ No

B. If your answer to A is yes, how many?: _____ Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff S. E. RILEY
Defendants TERHUNE ET AL

2. Court (if Federal Court, give name of District; if State Court, give name of County)

U.S. Dist. CT. EASTERN Dist. OF CA

3. Docket Number 2:06-CV-00765-GEB (GGH)

4. Name of judge to whom case was assigned _____

5. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit ?

7. Approximate date of disposition ?

II. Exhaustion of Administrative Remedies

UCGCB # G625922

A. Is there a grievance procedure available at your institution? ☒ Yes ☐ No

B. Have you filed a grievance concerning the facts relating to this complaint?

☒ Yes ☐ No

If your answer is no, explain why not _____

C. Is the grievance process completed?

☒ Yes ☐ No

III. Defendants

(In Item A below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item B for the names, positions and places of employment of any additional defendants.)

A. Defendant S. KERNAN is employed as SEC. OF
CORREC. & REHAB. at CAL. DEPT. OF CORREC. & REHAB.

B. Additional defendants W.L. MONTGOMERY (WARDEN CALIPATRIA
STATE PRISON) B. HEDRICK (CHIEF DEPUTY WARDEN)
L. PAUL (ASSOCIATE WARDEN) G. CHAVARRIA (ASSOCIATE
WARDEN) J. HATFIELD (CAPTAIN) E. URBIE (LT.)
G.Z. HERNANDEZ (LT.) C. IMADA (SGT.) R. WITTE (C/O)
R. GARCIA (C/O) J. PRICE (C/O) M. WHITMAN (ASSOC. WARDEN)
L. NEWMAN (LT.) C. ESPITIA (APPEALS STAFF ANALYST)

1 DEFENDANT S. KERNAN (SECRETARY OF CORRECTIONS
 2 AND REHABILITATIONS) IN HIS OFFICIAL
 3 CAPACITY did willfully, AND DELIBERATE, under the
 4 COLOR, AND AUTHORITY OF STATE LAW VIOLATE
 5 PLAINTIFF'S FREEDOM OF RELIGION, RIGHT TO REDRESS,
 6 SEARCH AND SEIZURE, RIGHT TO DUE PROCESS, FREEDOM
 7 FROM CRUEL PUNISHMENT, FREEDOM FROM DOUBLE
 8 JEOPARDY, FREEDOM FROM BEING BULLIED, RIGHT
 9 TO REFUSE MEDICAL TREATMENT, FAILURE TO
 10 PROTECT THOSE UNDER HIS CARE/CHARGE.

11 S. KERNAN AS SEC. OF CORREC. IMPLEMENTED
 12 A MANDATORY TESTING OF ALL INMATE AND STAFF
 13 URINE; SUPPOSEDLY TO SEARCH FOR ILLEGAL DRUGS.
 14 THIS MANDATORY TESTING VIOLATES PLAINTIFFS
 15 SEARCH FREEDOMS. THE STAFF WHOSE DUTY IT
 16 IS TO PERFORM THE COLLECTION OF URINE DOES
 17 NOT GIVE THE PERSON WHOSE URINE IS TAKEN
 18 A RECEIPT FOR THE; NOR THE RESULT(S) OF
 19 THE TEST OF THE URINE. THEREBY VIOLATING
 20 UNREASONABLE SEARCH & SEIZURE RIGHT(S).
 21 IF THE URINE IS FOUND TO HAVE ILLEGAL
 22 SUBSTANCE(S) IN THEM; THE PERSON IS NOT ALLOW-
 23 ED ADEQUATE INFORMATION TO CHALLENGE
 24 THE FINDINGS OF THE LABORATORY. CALIPATRIA
 25 STATE PRISON HAS RECYCLED AIR & WATER.
 26 THE POLICY/RULE AS APPLIED HAS NO EXCEPTION
 27 FOR RELIGIOUS OBSERVANCE. THE POLICY IS ONE
 28 OF GUILT UNTIL PROVEN INNOCENT.

1 DEFENDANT S. KERNAN HAS FAILED TO PROTECT
 2 PLAINTIFF FROM FALSE RULE VIOLATION REPORT(S)
 3 FILED BY C/O'S WITTE, PRICE, AND GARCIA. PLANT-
 4 IFF FILED ADMINISTRATIVE APPEALS CONCERNING
 5 THE FALSIFICATION OF OFFICIAL STATE DOCUMENT(S)
 6 S. KERNAN DID NOT INVESTIGATE THESE CLAIM(S)
 7 AS REQUIRED BY LAW. KERNAN HAS ALLOWED, AND
 8 BY INACTION PROMOTED THE AUTHORIZATION OF 9
 9 R.V.R(S) FOR REFUSING TO GIVE URINE. SOME
 10 R.V.R(S) WERE WRITTEN WHILE PLAINTIFF WAS
 11 PLACED ON C/C STATUS. PLATIFF HAS BEEN BULL-
 12 IED, AND HARRASSED, FOR INVOKING HIS RIGHT(S).
 13 PLAINTIFF HAS BEEN REMOVED FROM A
 14 PAID JOB, LOSS OF AT LEAST 180 DAY(S) OF
 15 EARNED CREDIT, CONTACT VISIT, PHONE, AND
 16 C.T.Q. 10 DAY(S) AT A TIME FOR EACH R.V.R. THAT
 17 THESE ABUSE(S) CONTINUE TO THIS DAY. THEY BEGAN
 18 10-21-14. S. KERNAN HAS ALLOWED THE APPEAL
 19 STAFF TO UNLAWFULLY SCREEN OUT APPEALS FOR
 20 UNFAIRIOUS REASON(S) SUCH AS ASKING THAT
 21 ALL R.V.R(S) BE DISMISSED, WHEN THE R.V.R. BEING
 22 APPEALED STATES THE DATE OF PREVIOUS R.V.R(S)
 23 SEE (602# CA1-15-01404, CA1-C-15-01664, CA1-C-
 24 -15-1920. THE ACT OF SCREENING OUT THESE APPEAL(S)
 25 WERE DONE TO CHILL THE RIGHT OF REDRESS.
 26 THAT EACH AND EVERY ACT WERE DONE BY AGENTS
 27 OF C.D.C.R. ACTING UNDER COLOR OF STATE LAW.
 28 THAT KERNAN KNEW, OR SHOULD'VE KNOWN ABOUT

DEFENDANT S. KERNAN

these violations of state and federal law. That the bullying took place at the tacit approval of S. KERNAN, where Plaintiff is scheduled before Board of Parole Hearing 2-26-16. That the multiple R.U.R.(s) for the same offense violates state and federal law. That S. KERNAN has the authority, and duty to stop the abuse by his subordinates, but failed to do so. Procedural and substantive due process

Defendant S. KERNAN is being sued in his official capacity for the sum of \$1.5 million, declaratory, and injunctive relief are prayed for in this complaint. Money damages are from V.C.G.C.B. #G625922

Defendant S. KERNAN failed to give a copy of clean test to inmates who submitted urine as provided by state law. Has not accounted for all the urine taken from inmates. Has not took adequate precaution(s) to secure the personal information of those who submitted urine for analysis. As part of punishment C.D.C.R. is mandating AA/NA, which violates religious freedom as established by Fed. Court.

DEFENDANTS. KERNAN

1 DEFENDANT W.L. MONTGOMERY (WARDEN CALIPATRIA
2 STATE PRISON) IN his OFFICIAL CAPACITY
3 AND INDIVIDUALLY FOR FAILURE TO PROTECT, EQUAL
4 PROTECTION, VIOLATION(S) OF RELIGIOUS FREEDOM
5 SUBSTANTIVE, AND PROCEDURAL DUE PROCESS
6 CRUEL PUNISHMENT, DOUBLE JEOPARDY, BULLYING
7 FALSIFICATION OF DOCUMENT(S), FAILURE TO INVEST-
8 IGATE ABUSE by AGENT(S) UNDER his AUTHORITY
9 FROM 10-21-14 TO THE PRESENT, THE PLAINTIFF
10 HAS BEEN BOMBARDED WITH R.U.R.(S) FOR FAILURE
11 TO PROVIDE URINE FOR URINE ANALYSIS. C/O
12 WITTE BEGAN THE PROCESS BY FALSIFYING AN
13 OFFICIAL STATE DOCUMENT R.U.R. 10-14-C-068,
14 AND HAS STEADILY CONTINUED THRU R.U.R. 12-15-C-099
15 C/O WITTE FALSIFIED his R.U.R. WHEN PLAINTIFF
16 COMPLAINED, W.L. MONTGOMERY FAILED TO INVESTIGATE
17 THE INCIDENT. INSTEAD he CONFIRMED the R.U.R.
18 THE EARNED CREDIT LOSS, LOSS OF CONTACT, AND
19 NONCONTACT VISIT(S), PHONE, AND CTG. W.L. MONT-
20 GOMERY ALSO UPHOLD THE TAKING OF PLAINTIFFS
21 PAID JOB ASSIGNMENT, PLACEMENT ON C/C STATUS
22 WHERE PLAINTIFF WAS CONTINUALLY GIVEN R.U.R.(S)
23 FOR REFUSING TO GIVE URINE. THAT ALL THESE
24 ACTS WERE DONE BY AGENT(S) OF C.D.C.R. AT
25 CALIPATRIA STATE PRISON; WHERE W.L. MONTGOM-
26 ERY IS THE WARDEN. THAT W.L. MONTGOMERY
27 FAILED TO INVESTIGATE THE ABUSE, WHEN
28 HE ~~HE~~ KNEW OR SHOULD'VE KNOWN

1 About the Abuse, That the Agent(s) Under
 2 his Charge bullied and harrased Plaintiff
 3 with 9 R.U.R(s) From 10-21-14 to Present.
 4 That C/O(s) Witte, Price, and R Garcia
 5 Falsified document(s), did not Provide Receipts
 6 to inmates when taking Urine From them.
 7 That Chief Deputy B. Hedrick, Assoc. Warden
 8 L. Paul, M. Whitman, G. Chavarria in thier Official
 9 Capacity did not ensure that Procedure(s)
 10 were Followed, That the disciplinary hearing
 11 were law Full, that all Urine Sample(s) were
 12 accounted for. W.L. Montgomery as Warden
 13 Failed to Provide all inmates who submitted
 14 Urine Received a copy of the U/A's when
 15 they were returned. Thereby anyone whose
 16 test were clean was not given a copy of
 17 that test as the law require(s). Those who
 18 Refuse to give Urine are unlawfully Punished,
 19 severely, and cumulatively. As Plaintiff has Received
 20 9 R.U.R.(s) 2 in the month of Dec. 2016, Plaintiff
 21 has Proof in 602nd CAI-C-15-1708, which was
 22 initially Screened out by Appeals illegally
 23 then when the Appeal was heard it was
 24 Proven that C/O R. Garcia Falsified the
 25 document. SGT. Imada Approved the R.U.R
 26 without checking it. LT. E Uribe Found me guilty
 27 And Assesed 30 days h.o.c. 180 loss contact visits
 28 90 day(s) loss Phone 10 day(s) CTQ.

DEFENDANT W.L. MONTGOMERY

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1 FOR R.U.R 9-15-C-051, CPT. J HATFIELD
2 CONFIRMED THE R.U.R. SO DID G. CHAVARRIA AW.
3 ALL AS A MATTER OF COURSE, WITH NO OVER-
4 SIGHT, OF THOSE THEY ARE SUPPOSED TO SUPERVISE.
5 JUST RUBBER STAMP APPROVAL, THE ACTS OF
6 THESE AGENT(S) OF C.D.C.R. VIOLATE SUBSTANT-
7 IVE, AND PROCEDURAL DUE PROCESS, AS IS
8 CUSTOM AT CALIPATRIA STATE PRISON.
9 W.L. MONTGOMERY CONFIRMED THE ~~SEE~~ PLACING
10 OF PLAINTIFF IN A.A./N.A. LIST AGAINST
11 PLAINTIFF'S RELIGIOUS FREEDOM, AND OBJECTIONS.
12 THESE ACTS, AND FAILURE TO PROTECT FROM BEING
13 HARRASSED, AND BULLIED BY STATE AGENTS, ARE
14 DELIBERATE, AND DESIGNED TO CAUSE MENTAL HEALTH
15 PROBLEMS FOR PLAINTIFF. WHERE PLAINTIFF IS
16 SCHEDULED FOR BPH ON 2-26-16. THE AGENTS
17 OF C.D.C.R. ATTEMPT TO MAKE IT APPEAR THAT PLAINTIFF
18 HAS AN ALCOHOL, AND OR DRUG PROBLEM. WITH NO
19 PROOF OTHER THAN FALSIFIED STATE DOCUMENTS)
20 ILLEGALLY STACKED UP UPON EACH OTHER. RAISING
21 PLAINTIFF'S CLASSIFICATION SCORE. ALL THESE R.U.R(S)
22 ARE BULLYING TACTICS. PLAINTIFF SEEKS DECLATORY
23 INJUNCTIVE, AND TORT DAMAGES. THE TORT DAMAGE
24 IS \$1.5 million UCGCB #G 625922. PLAINTIFF
25 HAS JUST RECEIVED ANOTHER FALSIFIED R.U.R
26 (SEE R.U.R. 01-16-C-037) DOUBLE JEOPARDY

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DEFENDANT W.L. MONTGOMERY

1 DEFENDANT B. HEDRICK (CHIEF DEPUTY WARDEN
 2 CALIFORNIA STATE PRISON) IN HIS OFFICIAL AND
 3 INDIVIDUAL CAPACITY; OF CHIEF DEPUTY WARDEN.
 4 DID UNDER THE COLOR OF AUTHORITY OF STATE
 5 LAW, WILLFULLY AND NEGLIGENTLY VIOLATE PLAINTIFF'S
 6 RIGHT(S); CRUEL PUNISHMENT, EQUAL PROTECTION,
 7 SUBSTANTIVE, AND PROCEDURAL DUE PROCESS,
 8 RELIGIOUS FREEDOM, FREEDOM FROM BEING BULLIED,
 9 STARTING ON 10-21-14, AGENTS OF C.D.C.R.
 10 C/O WITH AUTHORED AN R.U.R # 10-14-C-068, THIS
 11 R.U.R. WAS A FALSIFIED OFFICIAL STATE DOCUMENT.
 12 PLAINTIFF CONSISTENTLY STATED THIS FACT. YET B. HEDR-
 13 ICK IN HIS OFFICIAL CAPACITY AS CHIEF DEPUTY
 14 WARDEN FAILED TO INVESTIGATE THIS MATTER. THERE
 15 BY ALLOWING OTHER C.D.C.R. AGENTS TO ~~PERPETRATE~~
 16 PERPETUATE THIS INJUSTICE UPON PLAINTIFF.
 17 LT. URIBE THE HEARING OFFICER, G. CHAVARRIA THE
 18 FAC. CAPT. L. PAUL THE ASSOC. WARDEN. B. HEDRICK'S
 19 FAILURE TO PROPERLY INVESTIGATE THIS MATTER
 20 CAUSED PLAINTIFF SIGNIFICANT HARDSHIP, LOSS
 21 OF AN PAID JOB ASSIGNMENT, C.T.Q., LOSS OF
 22 CONTACT, AND NON CONTACT VISITS, PLACEMENT ON
 23 A.A./M.A. list, 30 DAY(S) EARNED CREDIT, 90 DAY(S)
 24 LOSS OF PHONE. THESE ACT(S) WERE COMPOUNDED
 25 BY BEING PUT ON A MANDATORY U/A list, WHERE
 26 BY AGENTS OF C.D.C.R. CONTINUOUSLY ASK FOR
 27 URINE, THEN AUTHOR HARRASSING R.U.R(S) IN AN
 28 ATTEMPT TO BULLY PLAINTIFF INTO SUBMISSION.

1 AS CHIEF DEPUTY WARDEN B. HEDRICK HAS AN
 2 obligation to uphold the law, and protect those
 3 under his charge/care. PLAINTIFF HAS CONSISTENT-
 4 ly claimed the Agents of C.D.C.R. FALSIFY
 5 STATE document(s). APPEAL ANALYST C. ESPITIA,
 6 HAS BEEN UNLAWFULLY SCREENING OUT APPEALS.
 7 B. HEDRICK IN CONFIRMING THESE REINSTATED
 8 APPEALS, without disciplining OR REMOVING
 9 C. ESPITIA FROM THE APPEALS OFFICE. IS giving
 10 TACIT APPROVAL OF THESE UNLAWFUL ACT(S). THERE
 11 by signaling others that they may violate
 12 PLAINTIFF'S due PROCESS, AND REDRESS RIGHTS.
 13 APPEAL # CAI-C-15-1104, CAI-C-15-01664, CAI-C-15-
 14 1970, ARE CLASSIC EXAMPLES THAT B. HEDRICK KNEW
 15 OR SHOULD'VE KNOWN ABOUT C. ESPITIA'S UNLAWFUL
 16 ACTIONS. B. HEDRICK CONFIRMED THE R.U.R.S
 17 THAT WERE AUTHORED BY C.D.C.R. AGENTS, UPON
 18 APPEAL. ALLOWING PLAINTIFF TO BE HARRASSED,
 19 bullied, mistreated, AND DENIED SUBSTANTIVE,
 20 AND PROCEDURAL due PROCESS RIGHTS in the
 21 R.U.R. HEARINGS, AND UPON REDRESS. PLAINTIFF'S
 22 RELIGIOUS FREEDOMS ARE BEING VIOLATED, AS
 23 C.D.C.R. AGENTS HAVE PLACED ME ON AN A.A./N.A.
 24 list. WHICH PLAINTIFF DOES NOT NEED OR WANT.
 25 C.D.C.R. AGENT(S) CONTINUE TO BULLY AND HARR-
 26 ASS PLAINTIFF WITH R.U.R(S) DUE TO PLAINTIFF'S
 27 NAME AND NUMBER BEING PLACED ON A MANDAT-
 28 ORY U.A. list. (SEE R.U.R OF-16-C-037)

DEFENDANT B. HEDRICK

(3.)

1 B Hedrick is being sued in his OFFICIAL
2 AND INDIVIDUAL CAPACITY. PLAINTIFF SEEKS
3 DECLATORY, INJUNCTIVE, AND TORT DAMAGES IN THE
4 SUM OF \$1.5 million VGGCB # G625922
5 C.D.C.R AGENTS ARE CONTINUOUSLY HARRASSING
6 AND bullying PLAINTIFF WITH R.V.R.(S)
7 B. Hedrick does not stop them, OR PROTECT
8 PLAINTIFF FROM THESE ATTACKS. ~~DO~~ Double
9 JEOPARDY
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DEFENDANT B Hedrick

1 DEFENDANT: L. PAUL (ASSOC. WARDEN CALIPATRIA
 2 STATE PRISON) IN HIS OFFICIAL, AND INDIVIDUAL
 3 CAPACITY IS BEING SUED FOR \$1.5 million,
 4 ON 12-4-14, L. PAUL did willfully, and
 5 intentionally violate PLAINTIFFS EQUAL PROTECT-
 6 ion Rights, SUBSTANTIVE AND PROCEDURAL due
 7 PROCESS Right(s), FREEDOM OF RELIGION Rights,
 8 DEFENDANT L. PAUL in his OFFICIAL CAPACITY
 9 AS ASSOC. WARDEN C/D FACILITY(S) did CONFIRM
 10 WITHOUT INVESTIGATION OF WRONG DOING R.U.R
 11 #10-14-C-068. L. PAUL KNEW OR SHOULD'VE KNOWN
 12 THAT C/O R. WITTE FALSIFIED THE REPORT. L. PAUL'S
 13 FAILURE TO INVESTIGATE THE MATTER HAS CAUSED
 14 SIGNIFICANT HARD SHIP TO PLAINTIFF. LOSS OF
 15 EARNED CREDIT, LOSS OF VISITS, LOSS OF PAID
 16 JOB ASSIGNMENT, PLACEMENT ON MANDATORY U.A.
 17 LIST, PLACEMENT ON A.A./N.A. list which VIOLATES
 18 FREEDOM OF RELIGION. L. PAUL KNEW, OR SHOULD'VE
 19 KNOWN THAT HIS INACTION OF INVESTIGATION
 20 WOULD HARM PLAINTIFF. THE REPORT ITSELF
 21 WAS AUTHORED WRONG WITH THE WRONG RULES
 22 VIOLATED NUMBER.

23 ALL VIOLATIONS WERE UNDER THE COLOR AND AUTHORITY
 24 OF STATE LAW.

1 DEFENDANT M. Whitman (ASSOC. WARDEN
 2 CALIFORNIA STATE PRISON) IN HER OFFICIAL,
 3 AND INDIVIDUAL CAPACITY, IS BEING SUED FOR
 4 \$1.5 million dollars. M. Whitman AS ASSOC.
 5 WARDEN C/D FACILITY ON OR ABOUT 4-16-15
 6 did willfully AND deliberately violate PLAINTIFF'S
 7 PROCEEDURAL AND SUBSTANTIVE due PROCESS, EQUAL
 8 PROTECTION, CRUEL PUNISHMENT, RELIGIOUS FREEDOM.
 9 All violation WERE done UNDER the COLOR AND
 10 AUTHORITY OF STATE LAW. M. Whitman did AFFIRM
 11 R.U.R. 62-15-C-110, the Rule violated NUMBER
 12 WAS NOT SUBSTANTIATED. THE AUTHOR FALSIFIED
 13 the REPORT, AS I WAS NOT IN MY CELL ON
 14 2-28-15. I WAS AT MY JOB ASSIGNMENT.
 15 THE REPORTING C/O DID NOT SIGN THE R.U.R.
 16 AS A C.D.C.R. AGENT THE REPORTING C/O MUST
 17 SIGN THE R.U.R. LT. NEWMAN, CPT. G. CHAVARRIA,
 18 AND ASSOC. WARDEN M. Whitman; IN THEIR
 19 ZEST TO PUNISH PLAINTIFF CONVENIENTLY OVERLOOKED
 20 THESE TANGIBLE FACTS. PLAINTIFF LOSS 30 DAYS
 21 EARNED CREDIT, 180 DAYS OF VISIT(S), 10 DAYS C.T.Q.,
 22 PLACED ON A MANDATORY U.A. list, PLACED ON
 23 A.A./N.A. list. VIOLATING PLAINTIFF'S FREEDOM
 24 OF RELIGION. PLAINTIFF HAS SUFFERED SIGNIFICANT
 25 HARDSHIP due to DEFENDANT M. Whitman's FAILURE
 26 TO UPHOLD THE LAW; LOSS OF PAID JOB ASSIGN-
 27 MENT, PLACEMENT ON C/C STATUS. M. Whitman
 28 HAD A DUTY TO PROTECT PLAINTIFF BY FOLLOWING

7.
1 PROPER PROCEDURE(S), AND ~~THE~~ dismiss
2 THE R.U.R. # 62-15-C-110. INSTEAD M. WHITMAN
3 CHOSE TO GO WITH THE FLOW, AND NOT HONOR
4 THE RIGHTS OF PLAINTIFF. M. WHITMAN HAD
5 A FIDUCIARY DUTY, WHICH SHE WILL FULLY AND
6 DELIBERATELY CHOSE TO IGNORE. TO AFFIRM
7 AN R.U.R. WHICH RULE NUMBER IS FOR POSSESSION
8 OF AN ILLEGAL SUBSTANCE; WHEN THE BODY OF
9 THE R.U.R. IS FOR NOT PROVIDING URINE. THIS
10 SHOWS THAT THE AGENT(S) OF CDCR DO NOT
11 ADHERE TO LAW OR RULE DOUBLE JEOPARDY
12 TORT CLAIM # VCGCB 625922

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DEFENDANT M. WHITMAN

1 DEFENDANT G. CHAVARRIA (CPT. / ASSOC. WARDEN
 2 CALIPATRIA STATE PRISON) IN HIS OFFICIAL
 3 CAPACITY, AND INDIVIDUALLY IS BEING SUED FOR
 4 \$1.5 million dollars FOR VIOLATION OF PROCEED-
 5 URAL AND SUBSTANTIVE due PROCESS, EQUAL PROTECT-
 6 ION, CRUEL PUNISHMENT, Religious FREEDOM, FREEDOM
 7 FROM BEING BULLIED. ON 10-21-14 C/O WITTE AN
 8 AGENT OF CDCR. did willfully AUTHOR A FALSIFIED
 9 R.V.R. ON 2-28-15 C/O IBARRA AN AGENT OF CDCR.
 10 did willfully AUTHOR AN R.V.R. THAT WAS FALSIFIED
 11 AND NOT SIGNED BY C/O IBARRA. WITTE'S R.V.R. # 10-14-C-
 12 068 WAS AFFIRMED BY CPT. G. CHAVARRIA ON 12-3-14
 13 THE BODY OF THE REPORT DOES NOT MATCH THE RULE
 14 VIOLATION NUMBER. C/O IBARRA'S REPORT 02-15-C-110
 15 IS SIMILAR. THESE 2 REPORT(S) WERE THE BASIS FOR
 16 PLAINTIFF'S PLACEMENT ON C/C STATUS. PUTTING
 17 A SIGNIFICANT HARDSHIP ON PLAINTIFF. HAD G. CHAVARR-
 18 IA DONE HIS JOB ACCORDING TO THE LAW AND RULES
 19 PLAINTIFF WOULD NOT HAVE SUFFERED. CPT. G. CHAVARR-
 20 IA, HAS CONTINUALLY VIOLATED PLAINTIFF'S RIGHT(S)
 21 BY AFFIRMING ALL R.V.R(S) WRITTEN ON PLAINTIFF
 22 CONCERNING URINE TESTING. REFUSING TO INVESTIG-
 23 ATE ANY OF THE R.V.R(S). G. CHAVARRIA RUBBER
 24 STAMP(S) THE R.V.R(S) WHEN THEY CROSS HIS
 25 DESK. ON 9-18-15 C/O R. GARCIA, AUTHORED R.V.R.
 26 09-15-C-051 A FALSIFIED REPORT. AS IS STANDARD
 27 PRACTICE AT CALIPATRIA STATE PRISON 'C' FACILITY.
 28 PLAINTIFF FILED APPEAL # CAL-2-15-01708

1 C/O R. GARCIA IS AN AGENT OF C.D.C.R. FILED THE
 2 FALSIFIED R.U.R. #09-15-C-051 Sgt. IMADA APPROVED
 3 THE R.U.R. Lt. URIBE HELD A HEARING ON 10-17-15.
 4 FINDING ME GUILTY ASSESSING HIS PUNISHMENT
 5 ON 10-26 CPT. J. HATFIELD AFFIRMED, ON 10-26-15
 6 AW. G. CHAVARRIA AFFIRMED. WHEN PLAINTIFF APPEAL-
 7 ED #CA1-C-15-0178 THE APPEAL WAS GRANTED.
 8 AGENT C/O R. GARCIA HAD FALSIFIED HIS REPORT.
 9 ALL OF THE PROCEDURES THAT WERE SUPPOSED
 10 TO PROTECT ME FROM BEING ILLEGALLY PUNISHED HAD
 11 BEEN SYSTEMATICALLY VIOLATED. PLAINTIFF SUFFERED
 12 LOSS OF YARD, PHONE, CT.Q. DUE TO A FALSE
 13 REPORT. THE APPEAL ALSO SHOWED THAT C. ESPINOSA
 14 TRIED TO SCREEN OUT THE APPEAL UNLAWFULLY,
 15 AND REMOVED THE SCREEN OUT SHEET FROM THE
 16 APPEAL. PLAINTIFF HAS BEEN HARRASSED BY
 17 FACILITY "C" STAFF BECAUSE G. CHAVARRIA ALLOWS,
 18 AND SUPPORTS THEIR BULLYING OF PLAINTIFF. MY RIGHTS
 19 HAVE BEEN TRAMPLED ON AND G. CHAVARRIA DOES
 20 NOTHING TO STOP THE ABUSE. INSTEAD HE ENCOURAGES
 21 THE TREATMENT BY HIS TACIT, AND COVER UP ~~THE~~
 22 ACTIONS. PLAINTIFF WAS GIVEN 2 R.U.P. WHILE ON
 23 C/C STATUS, G. CHAVARRIA INSTEAD OF ORDERING
 24 STAFF NOT TO AUTHOR MORE R.U.R.S AGAINST PLAINTIFF.
 25 CONFIRMED AND PUNISHED PLAINTIFF. G. CHAVARRIA
 26 KNEW OR SHOULD'VE KNOWN THAT R.U.R. 09-15-C-051
 27 WAS FALSIFIED JUST BY CHECKING THE HOUSING
 28 A SIMPLE TEST. G. CHAVARRIA CHOSE TO NOT ~~DO~~ DO

DEFENDANT G. CHAVARRIA

1 his Fedociary duty, He chose to willfully And
2 deliberately violate my Right(s). Even now
3 I Am still HARASSED (SEE R.V.P, 01-16-C-037)
4 And bullied by C.D.C.R. Agents, G. CHAVARRIA
5 is AWARE OF THE BPH ON 2-26-16, HE
6 CHOOSES to Allow his subordinate(s) to violate
7 the law, And my Right(s) double JEOPARDY
8 TORT CLAIM UGCB #G 625299

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DEFENDANT G CHAVARRIA

1 DEFENDANT J. HATFIELD (LT./CAPT. CALIPATRIA
 2 STATE PRISON) is being sued in his OFFICIAL
 3 AND INDIVIDUAL CAPACITY FOR THE SUM OF
 4 \$1.5 million FOR VIOLATING CRUEL PUNISH-
 5 MENT, EQUAL PROTECTION, PROCEDURAL AND SUBSTANTIVE
 6 DUE PROCESS, RELIGIOUS FREEDOM, FREEDOM FROM
 7 BEING BULLIED. ON 1-8-15, PLAINTIFF WAS CITED
 8 AN R.U.R. # 01-15-C-0022, ON 2-1-15 LT. J. HATFIELD
 9 AFFIRMED, ON 2-24-15 THE A.W. DISMISSED THE
 10 R.U.R. ON 9-18-15 PLAINTIFF WAS CITED R.U.R.
 11 09-15-C-051, ON 10-24-15 J. HATFIELD (CPT.) AFFIRMED
 12 THE R.U.R. ON 12-7-15, R.U.R. 09-15-C-051 WAS
 13 DISMISSED. IN BOTH CASES PLAINTIFF'S RIGHTS WERE
 14 TRAMPLED ON. LT./CAPT. J. HATFIELD INTENTIONALLY ALLOWED
 15 PLAINTIFF'S RIGHTS TO BE VIOLATED. WHEN IT COMES TO PLAINTIFF
 16 AND THE U.S. J. HATFIELD DOES NOT PERFORM
 17 THE DUTY(S) ASSIGNED HIS POSITION. CPT. HATFIELD HAS
 18 NO RESPECT FOR THE LAW, OR HIS DUTY TO UPHOLD THE
 19 RULE(S) AND LAWS CONCERNING R.U.R. HEARINGS; WHEN
 20 IT IS APPLIED TO THE PLAINTIFF, ALL VIOLATION(S) WERE
 21 DONE UNDER THE COLOR AND AUTHORITY OF STATE
 22 LAW. J. HATFIELD'S ACTIONS WERE DESIGNED
 23 TO HARRASS AND BULLY PLAINTIFF. DOUBLE JEOPARDY
 24 TORT CLAIM UCG CB #G 625299

1 DEFENDANT E. URIBE (Lt. CALIPATRIA STATE
 2 PRISON. IN his individual AND OFFICIAL CAPACITY
 3 BEING SUED FOR \$2.5 million TORT VCGCB #
 4 G625922. UNDER the COLOR AND AUTHORITY OF
 5 STATE LAW, did willfully VIOLATE PLAINTIFF'S
 6 FREEDOM FROM HARRASSMENT AND bullying, EQUAL
 7 PROTECTION, CRUEL PUNISHMENT, double JEOPARDY,
 8 FREEDOM OF RELIGION. ON 11-8-14 Lt. E. URIBE HEARD
 9 R.V.R 16-14-C-068 which WAS AUTHORED by CLOWITTE
 10 AN AGENT OF C.D.C.R. FOR REFUSING to PROVIDE
 11 URINE FOR TESTING. THIS R.V.R. WAS FALSIFIED STATE
 12 DOCUMENT. THE body OF the R.V.R. DOES NOT MATCH
 13 THE RULE VIOLATION NUMBER. PLAINTIFF TOLD Lt. URIBE
 14 THAT CLOWITTE FALSIFIED the DOCUMENT. AS the
 15 HEARING OFFICER C.D.C.R. AGENT E. URIBE did NOT
 16 INVESTIGATE the MATTER. HE SUMMARILY FOUND
 17 PLAINTIFF guilty; ASSESSED 30 day(S) LOSS OF EARNED
 18 CREDIT, 10 day(S) LOSS OF YARD, 30 day(S) LOSS OF PHONE
 19 90 day(S) LOSS OF VISIT, 90 day(S) LOSS OF CONTACT VISIT(S)
 20 1 YEAR MANDATORY V.A. PLACEMENT ON A.A./N.A. List.
 21 AFTER THAT Lt. URIBE HEARD SEVERAL MORE
 22 R.V.R(S) CONCERNING V.A(S). EACH time TAKING
 23 30 day(S) OF EARNED CREDIT 90 days PHONE 180
 24 day(S) VISIT(S) 180 day(S) NON CONTACT 10 day(S) C.T.Q.
 25 ON 1 OCCASSION PLAINTIFF WAS ON C/C STATUS
 26 Lt. E. URIBE STATED "WE WILL CONTINUE gIVING YOU
 27 R.V.R(S) AND FINDING YOU guilty". URIBE'S
 28 ACTION(S) VIOLATE STATE AND FEDERAL LAW

1 URibe's ACTIONS CAUSED PLAINTIFF GREAT HARD
 2 SHIP. URibe NEVER CHECKED TO ENSURE THE
 3 R.V.R.(S) WERE VALID, HE PUNISHED THE PLAINTIFF
 4 TO THE MAXIMUM. ON 10-24-15 Lt. URibe HEARD
 5 R.V.R. # 09-15-C-051. Authored by C/O R GARCIA
 6 AN AGENT OF C.D.C.R. Lt. URibe FOUND PLAINTIFF
 7 GUILTY AND ASSESSED THE MAXIMUM PUNISHMENT.
 8 URibe KNEW OR SHOULD'VE KNOWN THAT R.V.R.
 9 09-15-C-051 WAS A FALSIFIED DOCUMENT; AS
 10 URibe HAD HEARD ANOTHER R.V.R. JUST PRIOR
 11 TO 09-15-C-051. HE KNEW OR SHOULD'VE KNOWN
 12 I WAS NOT IN THE HOUSING UNIT GARCIA SAID
 13 I WAS IN. Lt. URibe HAD PERSONALLY CALLED THE
 14 STAFF IN HOUSING UNIT 1 TO HAVE ME RELEASED.
 15 YET HE STILL JUDGED ME GUILTY. APPEAL # CAL-C-15-
 16 01769 PROVED THAT Lt. URibe DOES NOT FOLLOW
 17 RULE OR LAW, WHEN ADJUDICATING R.V.R.(S) WITH MY
 18 NAME AND NUMBER. URibe's ACTION(S) HAVE
 19 CAUSED PLAINTIFF LOSS OF A PAID JOB ASSIGNMENT
 20 AND PROPERTY, GREAT HARD SHIP. URibe HAS HARRASS-
 21 ED AND BULLIED PLAINTIFF IN AN ATTEMPT TO DAMAGE
 22 PLAINTIFF'S MENTAL HEALTH. Lt. URibe HAS PLACED
 23 PLAINTIFF ON A.A./M.A. List AND MANDATORY V.A.
 24 Lt. URibe HAS NO RESPECT FOR PLAINTIFF'S RIGHT(S)
 25 OR THE LAW. ALL ACT(S) AND/OR OMISSIONS WERE DONE
 26 UNDER THE COLOR AND AUTHORITY OF STATE LAW
 27
 28

DEFENDANT URibe

1 L. NEWMAN (LT. CALIFORNIA STATE PRISON)
 2 IN HIS OFFICIAL AND INDIVIDUAL CAPACITY IS
 3 BEING SUED FOR \$1.5 million FOR VIOLATING
 4 PLAINTIFF'S PROCEDURAL AND SUBSTANTIVE
 5 DUE PROCESS, EQUAL PROTECTION, CRUEL PUNISH-
 6 MENT, FREEDOM OF RELIGION, FREEDOM FROM HARASSM-
 7 ENT, AND bullying. On 4-6-15 Lt. NEWMAN held
 8 AN R.V.R. # 02-15-C-110 HEARING. THE CDCR
 9 AGENT WHO AUTHORED THE R.V.R. C/O E. I BARRA
 10 DID NOT SIGN THE R.V.R. THE RULE(S) VIOLATION NUMBER
 11 DID NOT MATCH THE REPORT. L. NEWMAN DID NOT
 12 INVESTIGATE THE REPORT FULLY. PLAINTIFF WAS NOT
 13 IN HIS CELL ON 2-28-15 AT 0900. HE WAS AT HIS
 14 JOB ASSIGNMENT. YET Lt. L. NEWMAN FOUND PLAINTIFF
 15 GUILTY, ASSESSED 30 DAYS LOSS OF EARNED CREDIT, 10 DAYS
 16 CTQ 90 DAYS LOSS OF PHONE 180 DAYS LOSS OF CONTACT
 17 VISIT 180 LOSS NON CONTACT VISIT(S) 1 YEAR MANDATORY
 18 U.A. REFERRAL TO U.C.C. FOR C/C STATUS. A.A / N.A.
 19 THESE REPRESENT A SIGNIFICANT HARDSHIP TO PLAINTIFF.
 20 Lt. NEWMAN REFUSED TO FOLLOW THE LAW OR RULES
 21 INTENTIONALLY. L. NEWMAN'S ACTIONS WERE DONE
 22 UNDER THE COLOR AND AUTHORITY OF STATE LAW.
 23 DEFENDANT NEWMAN CHOSE TO INTENTIONALLY
 24 VIOLATE MY RIGHT(S). DOUBLE JEOPARDY
 25 TORT CLAIM UCGCB # 6625922

1 DEFENDANT G. Z. HERNANDEZ (LT. CALIPATRIA
 2 STATE PRISON) in his OFFICIAL CAPACITY
 3 ~~AND~~ INDIVIDUALLY BEING SUED FOR \$2.5 million
 4 FOR VIOLATION OF PLAINTIFF'S EQUAL PROTECTION,
 5 SUBSTANTIVE AND PROCEDURAL DUE PROCESS,
 6 CRUEL PUNISHMENT, FREEDOM OF RELIGION, FREEDOM
 7 FROM BULLYING AND HARASSMENT, DOUBLE JEOPARDY
 8 ON OR ABOUT 7-7-15 I WAS CITED R.U.R. # 07-15-C-
 9 013. THIS R.U.R. WAS AUTHORED BY T. GARCIA.
 10 AT THE HEARING G. HERNANDEZ FOUND ME
 11 GUILTY OF WHAT I DON'T KNOW, I WAS ASSESSED
 12 30 DAY LOSS OF EARNED CREDIT, 90 PHONE
 13 10 DAYS C.T.R., 180 DAYS LOSS OF VISIT, 180 DAY
 14 NON CONTACT VISITS, 1 YEAR MANDATORY TESTING
 15 U.A. ~~AND~~ PLACED ON A.A./N.A. list. THE R.U.R.
 16 I WAS SERVED WAS A JUXAPOSITION OF DIFFERENT
 17 R.U.R(S) RULES VIOLATED DID NOT MATCH THE
 18 CHARGE. THE DATE ON THE R.U.R. WAS 6-10-15
 19 AUTHORED BY ANOTHER C/O. AS AGENTS OF C.D.C.R.
 20 THESE INDIVIDUALS ARE MAKING UP WAYS TO
 21 HARASS AND BULLY PLAINTIFF, DOUBLE JEOPARDY
 22 IS VIOLATED, PROCEDURAL AND SUBSTANTIVE DUE
 23 PROCESS IS VIOLATED. THERE WAS AN INCIDENT
 24 PACKAGE CHECKED ON THE R.U.R WHICH I DID
 25 NOT RECEIVE. ALL THESE ACT WERE DONE UNDER
 26 THE COLOR AND AUTHORITY OF STATE LAW. G. Z. HERNANDEZ
 27 KNEW OR SHOULD'VE KNOWN THE R.U.R(S) WERE
 28 ~~THE~~ PIECE MEAN TORT CLAIM V.C.G.C.B # G625922

1 DEFENDANT C. IMADA (SGT. CALIFORNIA STATE
 2 PRISON) IS SUED IN HIS OFFICIAL AND INDIVID-
 3 UAL CAPACITY. FOR THE SUM OF \$1.5 MILLION
 4 FOR VIOLATING DOUBLE JEOPARDY, EQUAL PROT-
 5 ECTION, PROCEDURAL, AND SUBSTANTIVE DUE PROCESS,
 6 FREEDOM OF RELIGION, FREEDOM FROM HARASSMENT
 7 AND BULLYING, CRUEL PUNISHMENT. SGT. C. IMADA
 8 HAS APPROVED R.V.R.(S) 10-14-068, 02-15-C-110,
 9 07-15-C-013, 09-15-C-051, AND OTHERS PLAINTIFF
 10 HAS RECEIVED. SGT. C. IMADA HAS A DUTY TO
 11 CHECK ALL THE R.V.R.S HE APPROVES. SGT. C. IMADA
 12 HAS AT HIS DISPOSAL ALL NECESSARY TOOLS TO PERFORM
 13 HIS ~~TA~~ TASK. SGT IMADA MERELY RUBBER STAMPS
 14 HIS APPROVAL TO THE R.V.R.S THAT HAVE MY
 15 NAME AND NUMBER. R.V.R. 09-15-C-051 IS A
 16 PRIME EXAMPLE: HAD SGT. IMADA DONE HIS JOB
 17 CORRECTLY, THAT R.V.R. WOULD NOT HAVE BEEN APPROVED
 18 UNDER THE COLOR AND AUTHORITY OF STATE LAW.
 19 SGT. C. IMADA CHOSE NOT TO FOLLOW THE LAW AND
 20 RULE; THEREBY CAUSING PLAINTIFF SIGNIFICANT
 21 HARDSHIP. SGT C. IMADA CHOSE TO IGNORE
 22 HIS DUTY INTENTIONALLY, AND WILLFULLY;
 23 SGT. IMADA KNEW OR SHOULD'VE KNOWN THAT
 24 R.V.R. 09-15-C-051 WAS FALSIFIED. JUST AS
 25 SGT. IMADA KNEW OR SHOULD'VE KNOWN I WAS
 26 NOT WHERE R. GARCIA SAID I WAS. TORT CLAIM
 27 UGCC.B # G625922
 28

1 DEFENDANT; R. Witte (C/O CALIPATRIA
 2 STATE PRISON) UNDER THE COLOR AND AUTHORITY
 3 OF STATE LAW, OFFICIAL CAPACITY, AND INDIVID-
 4 UALLY, SUED FOR \$2.5 MILLION V.G.C.B.# G
 5 625922 FOR THE VIOLATION OF PLAINTIFF'S
 6 EQUAL PROTECTION, CRUEL PUNISHMENT, PROCEED-
 7 URAI AND SUBSTANTIVE DUE PROCESS, FREED
 8 OM OF RELIGION, FREEDOM FROM HARRASSMENT,
 9 AND BULLYING, DOUBLS JEOPARDY. ON 10-21-14
 10 C/O WITTE DID WILLFULLY, AND INTENTIONALLY,
 11 FALSIFY R.V.R. 10-14-068. THIS MALICIOUS ACT
 12 HAS LED TO AN ONGOING HARRASSMENT, BULLYING
 13 BY OTHER C.D.C.R. AGENTS FOR NOT PROVIDING
 14 URINE FOR U.A. AGENT WITTE'S R.V.R. WAS
 15 FABRICATED TO PLACE PLAINTIFF'S BPH IN
 16 DANGER. THE BODY OF THE REPORT DOES NOT MATCH
 17 THE RULES VIOLATED NUMBER. THIS WAS INTENTIONAL
 18 AND ITS EFFECTS HAVE BEEN DIRE. PLAINTIFF
 19 HAS BEEN PLACED ON CIC STATUS LOSS PAID
 20 JOB POSITION, EARNED CREDIT, VISITS, PHONE,
 21 AND YARD. C.D.C.R. AGENTS HAVE CITED
 22 PLAINTIFF NUMEROUS ~~TIMES~~ TIMES. I HAVE BEEN
 23 PLACED ON MANDATORY U.A. A.A./U.A. LIST(S)
 24 PLAINTIFF CONTINUALLY RECEIVES HARRASSING
 25 R.V.R. (SEE 01-16-C-037)
 26
 27
 28

1 DEFENDANT R. GARCIA (C/O CALIPATRIA STATE
 2 PRISON) UNDER THE COLOR AND AUTHORITY
 3 OF STATE LAW, IN HIS INDIVIDUAL, AND
 4 OFFICIAL CAPACITY, BEING SUED FOR THE
 5 SUM \$1.5 million. FOR VIOLATING PLAINTIFF'S
 6 PROCEDURAL AND SUBSTANTIVE DUE PROCESS
 7 RIGHT, EQUAL PROTECTION, CRUEL PUNISHMENT
 8 FREEDOM OF RELIGION, FREEDOM FROM HARASSMENT
 9 AND BULLYING. TORT VCGCB# ~~G 625922~~ G 625922
 10 R. GARCIA ACTING AS AN AGENT OF CDCR,
 11 DID WILLFULLY AND MALICIOUSLY, FALSIFY AN
 12 OFFICIAL STATE DOCUMENT R.U.R.# 09-15-C-051
 13 THIS FALSIFIED DOCUMENT WAS PROVEN FALSE
 14 ON APPELLATE-15-0178. C/O GARCIA'S
 15 C/O GARCIA'S ACTIONS HAVE CAUSED ME GREAT
 16 HARDSHIPS, IN THE FORM OF LOSS EARNED CREDITS
 17 LOSS OF YARD, LOSS OF VISIT(S). PLACEMENT ON
 18 V.A MANDATORY list, A.A/N.A. UNDOE STRESS. I HAVE
 19 A BPH HEARING ON 2-26-16, C/O R. GARCIA HAS JUST
 20 RECENTLY FABRICATE 3 MORE R.U.R.(S) (SEE R.U.R. 12-15-C-
 21 099, 01-16-C-004, 01-16-C-037. VIOLATING DOUBLE
 22 JEOPARDY AND STACKING; CUMULATIVE

1 DEFENDANT (J. PRICE C/O CALIPATRIA STATE
 2 PRISON) UNDER THE COLOR AND AUTHORITY OF
 3 STATE LAW INDIVIDUALLY, AND IN OFFICIAL CAPACITY
 4 BEING SUED FOR THE SUM OF \$1.5 million
 5 UCCB # 6625922 FOR VIOLATING PLAINTIFFS
 6 PROCEDURAL AND SUBSTANTIVE DUE PROCESS RIGHTS
 7 EQUAL PROTECTION, RELIGIOUS FREEDOM, FREEDOM FROM
 8 HARASSMENT AND BULLYING. DOUBLE JEOPARDY
 9 ON 5-1-15, R.U.R # 05-15-C-013, AND ANOTHER
 10 R.U.R, 5-B-15, C/O J PRICE AN AGENT OF CDCR
 11 AUTHORED THE R.U.R. FOR REFUSING A U.A. ON RELIGIOUS
 12 AND CIVIL RIGHTS GROUND(S). C/O J. PRICE FULLY AWARE
 13 OF THE MATTER, CHOSE TO CITE PLAINTIFF WITH AN
 14 R.U.R. KNOWING IT VIOLATED STATE AND FEDERAL LAW.
 15 C/O PRICE'S ACTIONS CAUSED AN UNDUCE HARDSHIP
 16 ON PLAINTIFF. LOSS OF EARNED CREDIT(S) 30 DAYS
 17 LOSS OF PHONE 90 DAY(S) LOSS OF VISIT(S) 180 +
 18 180 DAY(S) 10 DAY(S) C.T.Q UNWARRANTED STRESS
 19 AS BPH APPROACHES ON 2-26-16.

1 DEFENDANT C. ESPITIA (APPEALS STAFF ANALYST
 2 CALIPATRIA STATE PRISON) UNDER THE COLOR AND
 3 AUTHORITY OF STATE LAW, in his/her individual
 4 AND OFFICIAL CAPACITY, BEING SUED FOR THE
 5 SUM OF \$1.5 million VCGCB #G625922
 6 VIOLATION OF THE RIGHT OF REDRESS, EQUAL
 7 PROTECTION, CRUEL PUNISHMENT, DEFENDANT
 8 C. ESPITIA did willfully, AND MALICIOUSLY
 9 in violation of LAW(S) AND RULE
 10 ILLEGALLY SCREEN OUT APPEALS # CAL-C-15-
 11 1404, CAL-C-15-01664, CAL-C-15-1920, CAL-C-
 12 15-01708, C. ESPITIA SCREENED OUT THESE
 13 AND OTHER APPEALS. STATING I HAD TO TAKE
 14 OUT ALL OTHER R.U.R(S). WHEN IN FACT ALL
 15 OTHER R.U.R(S) WERE MENTIONED IN THE R.U.R
 16 I WAS APPEALLING. AS AN AGENT OF C.D.C.R.
 17 C. ESPITIA VIOLATED PLAINTIFF'S RIGHT(S).

18 PLAINTIFF'S APPEALS WERE UNDULY HELD UP
 19 WHILE THE ILLEGAL PUNISHMENT WAS ENFOR-
 20 CED, C. ESPITIA SENT PLAINTIFF APPEAL # CAL-C-
 21 01264 WHICH HAD BEEN SCREENED OUT, FOR NO
 22 GOOD REASON. ALL OF C. ESPITIA'S ACTION(S) WERE
 23 DESIGNED TO CHILL MY RIGHT OF REDRESS. APPEAL
 24 ONLY WHAT C. ESPITIA SAYS(S) OR YOU CAN'T APPEAL
 25 A SERIOUS R.U.R. PLAINTIFF HAS SUFFERED UNNE-
 26 CESSARY/ HARD SHIP LOSS OF YARD, PHONE, VISIT(S)
 27 EARNED CREDIT, due to C. ESPITIA'S INTERFERENCE
 28 WITH THE APPEAL PROCESS.

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach extra sheets if necessary.)

SEE ATTACHED EACH DEFENDANT

V. Relief.

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

DECLARATORY RELIEF in FORM OF RULE(S) ARE illegal, INJUNCTIVE RELIEF in FORM OF PROHIBITING RULES TO APPLY, COMPENSATORY RELIEF in FORM 1.5 million dollars PER DEFENDANT

Signed this 28 day of JANUARY, 2016.

Mr. Steven E. Riley
(Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

1-28-16
(Date)

Mr. Steven E. Riley
(Signature of Plaintiff)

VERIFICATION

(C.C.P. § 446 & 2015.5 28 U.S.C. § 1746)

STATE OF CALIFORNIA
COUNTY OF IMPERIAL

I, STEVEN E. RILEY PLAINTIFF DECLARE UNDER PENALTY OF PERJURY THAT I AM THE
IN THE ABOVE ENTITLED ACTION. I HAVE READ THE FOREGOING
DOCUMENTS AND KNOW THE CONTENTS THEREOF AND THE SAME IS TRUE OF MY OWN
KNOWLEDGE EXCEPT AS TO MATTERS STATED THEREIN UPON INFORMATION AND BELIEF,
AND AS TO THOSE MATTERS, I BELIEVE THEM TO BE TRUE.

EXECUTED THIS 28 DAY OF JANUARY 2016 AT CALIPATRIA STATE PRISON,
CALIPATRIA CALIFORNIA, 92233-5002

M.S.E. Riley
SIGNATURE

(DECLARANT/PRISONER)

PROOF OF SERVICE BY MAIL

(C.C.P. § 1013(a) & 2015.5 U.S.C. § 1746)

I, RILEY, STEVEN E. AM A RESIDENT OF CALIPATRIA STATE PRISON, IN THE
COUNTY OF IMPERIAL, STATE OF CALIFORNIA. I AM OVER EIGHTEEN (18) YEARS OF AGE,
AND AM ~~A PARTY~~ A PARTY OF THE ABOVE ENTITLED ACTION. MY STATE PRISON ADDRESS
IS P.O. BOX 5002 CALIPATRIA STATE PRISON, CALIPATRIA, CALIFORNIA 92233-5002.

ON, 1-28-16, I SERVED THE FOREGOING:

(SET FORTH EXACT TITLE OF DOCUMENT(S) SERVED)

42 USC § 1983 COMPLAINT & IN FORMA PAUPERIS
ON THE PARTY(S) HEREIN BY PLACING A TRUE COPY THEREOF, ENCLOSED IN A SEALED
ENVELOPE(S) WITH POSTAGE THEREON FULLY PAID, IN THE UNITED STATES MAIL, IN A
DEPOSIT BOX SO PROVIDED AT CALIPATRIA STATE PRISON, CALIPATRIA CALIFORNIA 92233-
5002.

CLERK OF THE COURT
U.S. Dist CT. EAST. DIST. OF CA
501 I ST. SUITE 4-200
SACRAMENTO, CA. 95814-2322

THERE IS DELIVERY SERVICE BY UNITED STATES MAIL AT THE PLACE SO ADDRESSED AND
THERE IS REGULAR COMMUNICATION BY MAIL BETWEEN THE PLACE OF MAILING AND THE
SO ADDRESSED. I DECLARE UNDER PENALTY OF PERJURY THE FOREGOING IS TRUE AND
CORRECT.

DATE 1-28-16

M. Steven E. Riley
(DECLARANT/PRISONER)